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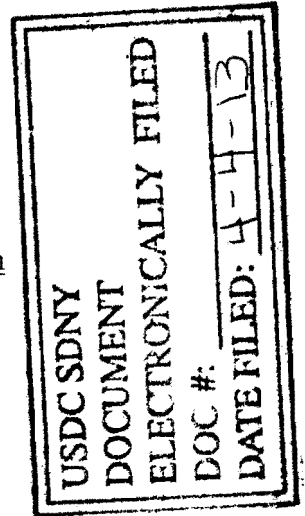
Brian A. Hill
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April 1, 2013

VIA FEDERAL EXPRESS

Hon. Ronald L. Ellis
United States Magistrate Judge
United States District Court for the Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *Sokolow v. Palestine Liberation Organization et al.* — 04-CV-397 (GBD) (RLE)

Dear Judge Ellis:

I write to request that, consistent with the recent extension granted Plaintiffs to submit liability expert reports, the deadline for submission of Defendants' liability expert reports be commensurately extended until May 10, 2013.

As the Court will recall, on March 20, 2013 Plaintiffs sought a modification of the Scheduling Order to extend the time for them to serve three of their liability expert reports from March 25 to April 10, 2013. The Court agreed to this extension on March 22. [Dkt. #312].

Under the current Scheduling Order, Defendants' expert disclosures and reports are due April 25, 2013. [Dkt. #310]. Although Plaintiffs served four liability expert reports on time (on March 25), the contents and opinions of the remaining liability reports will impact the scope and nature of Defendants' reports. Defendants thus request an equal extension of time to submit their liability expert disclosures and reports. Indeed, Plaintiffs' initial application for an extension pre-emptively consented to "any fair extension defendants might require . . . in order to respond to these three reports." March 20, 2013 Correspondence at 3. Presumably an extension equal to that provided Plaintiffs is "fair."

Defendants still intend to submit their damages experts' reports on April 25, consistent with Plaintiffs' production of all such reports on March 25. With regards to Defendants' *liability* experts, Defendants respectfully request until May 10, 2013 to submit such reports.

Sincerely,

Brian A. Hill

cc: Robert J. Tolchin, Esq.
       David I. Schoen, Esq.

SO ORDERED

MAGISTRATE JUDGE RONALD L. ELLIS

4-4-13